

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
RAQUEL LAZO
3 Assistant Federal Public Defender
Nevada State Bar No. 8540
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Raquel_Lazo@fd.org

7 Attorney for Louis Fahim Senegal

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 LOUIS FAHIM SENEGAL,

15 Defendant.

Case No. 2:19-cr-062-APG-DJA

STIPULATION TO CONTINUE
GOVERNMENT'S RESPONSE
DEADLINE TO MOTION
TO REOPEN DETENTION
HEARING (ECF NO. 51)
(First Request)

17
18 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
19 Trutanich, United States Attorney, and Shaheen Torgoley, Assistant United States Attorney,
20 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
21 and Raquel Lazo, Assistant Federal Public Defender, counsel for Louis Fahim Senegal, that the
22 Government's response deadline to the defendant's Motion to Reopen Detention Hearing (ECF
23 No. 51) currently scheduled for Friday, January 10, 2020, be vacated and set to Friday, January
24 17, 2020.
25
26

1 This Stipulation is entered into for the following reasons:

2 1. On December 27, 2019, Mr. Senegal filed a Motion to Reopen Detention
3 Hearing (ECF No. 51). The government's response is due on January 10, 2020.

4 2. The parties are actively working towards a resolution in this case which would
5 obviate the need for continued litigation.

6 3. The requested continuance would permit the parties sufficient time to attempt to
7 negotiate the matter.

8 4. The defendant is incarcerated and does not object to the continuance.

9 5. The parties agree to the continuance.

10 6. The additional time requested herein is not sought for purposes of delay, but
11 merely to allow counsel for defendant sufficient time within which to be able to effectively
12 prepare a reply.

13 7. Additionally, denial of this request for continuance could result in a miscarriage
14 of justice.

15 This is the first request to continue the response deadline date filed herein.

16 DATED this 9th day of January, 2020.

17
18 RENE L. VALLADARES
19 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

20 */s/ Raquel Lazo*
21 By _____
22 RAQUEL LAZO
Assistant Federal Public Defender

/s/ Shaheen Torgoley
By _____
SHAHEEN TORGOLEY
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 LOUIS FAHIM SENEGAL,

7 Defendant.

Case No. 2:19-cr-062-APG-DJA

ORDER

8
9 **ORDER**

10 IT IS THEREFORE ORDERED that the Government's response to the Defendant's
11 Motion to Reopen Detention Hearing (ECF No. 51) currently due on Friday, January 10, 2020,
12 be vacated and continued to Friday, January 17, 2020.

13 DATED this 10th day of January, 2020.

14 
15 _____
16 UNITED STATES MAGISTRATE JUDGE
17
18
19
20
21
22
23
24
25
26